

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

TRIUMFO, INC.	)	
	)	
Respondent,	)	
	)	
and	)	
	)	
INTERNATIONAL BROTHERHOOD OF	)	Case No. 28-CA-222740
TEAMSTERS, LOCAL 631, affiliated with	)	
the INTERNATIONAL BROTHERHOOD	)	
OF TEAMSTERS	)	
	)	
Charging Party,	)	

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**RESPONDENT'S EXCEPTIONS TO THE  
ADMINISTRATIVE LAW JUDGE'S DECISION**

Pursuant to Section 102.46 of the Board's Rules and Regulations, Series 8, as amended, the undersigned Counsel for Respondent respectfully files the following Exceptions to the Decision issued by Administrative Law Judge Mara-Louise Anzalone's on January 17, 2020.

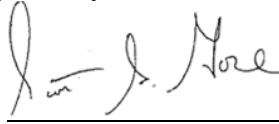
1. Exception 1 - The ALJ Incorrectly Found That Respondent Unilaterally Modified The Contract By Subcontracting Work. (ALJ-7)<sup>1</sup>
2. Exception 2 - The ALJ Incorrectly Found That Respondent Failed To Assert a Sound Arguable Basis For Its Failure to Adhere to its Contractual Obligations. (ALJ-8)
3. Exception 3 - The ALJ Incorrectly Determined Credibility Issues. (ALJ-4)
4. Exception 4 - The ALJ Incorrectly Determined that the Union Was Entitled to Information Regarding Non-Bargaining Unit Work Being Completed at Respondent's Warehouse. (ALJ- 12)

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<sup>1</sup> Throughout these exceptions, abbreviated references are employed as follows: "ALJ" followed by page and designate ALJ Decision.

5. Exception 5 – The ALJ Erred To The Extent She Attempted To Expand the Unit of Work. (ALJ-12)

Respectfully submitted,

By: 

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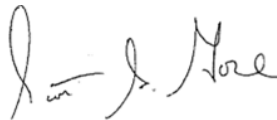
### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that on March 6, 2020, he electronically filed the attached **Respondent's Exceptions To The Administrative Law Judge's Decision** via the National Labor Relations Board website and sent a copy to the following via electronic mail.

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